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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC.

Plaintiff,

vs.

SONOS, INC.

Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. NO. 406)**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to
 7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.
 8 406) filed in connection with Sonos’s Motion for Leave to Amend Infringement Contentions (“Motion
 9 to Amend”) (Dkt. No. 407). If called as a witness, I could and would testify competently to the
 10 information contained herein.

11 3. Although Sonos filed its Administrative Motion on November 23, 2022, it did not serve
 12 the materials it filed under seal until November 28, 2022.

13 4. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Exhibit 1 to the Declaration of Geoffrey Moss in Support of Sonos, Inc.’s Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R. 3-6 (“Moss Declaration”) (“Exhibit 1”)	Entire Document	Portions outlined in red boxes	Google
Exhibit 4 to the Moss Declaration (“Exhibit 4”)	Entire Document	Portions outlined in red boxes	Google
Exhibit 8 to the Moss Declaration (“Exhibit 8”)	Entire Document	Portions outlined in red boxes	Google
Exhibit 9 to the Moss Declaration (“Exhibit 9”)	Entire Document	Portions outlined in red boxes	Google

1 5. I understand that the Court analyzes sealing requests for motions for leave to amend
2 infringement contentions pursuant to the “good cause” standard for non-dispositive motions. *See, e.g.*,
3 *Mediatek Inc. v. Freescale Semiconductor, Inc.*, No. 11-CV-5341 YGR, 2013 WL 10996547, at *1
4 (N.D. Cal. May 10, 2013).

5 6. The portions of Exhibits 1, 4, 8, and 9 outlined in red boxes contain references to
6 Google’s confidential business information and trade secrets, including details regarding source code,
7 architecture, and technical operation of Google’s products. The specifics of how these functionalities
8 operate is confidential information that Google does not share publicly. Thus, I understand that the
9 public disclosure of such information could lead to competitive harm to Google, as competitors could
10 use these details regarding the architecture and functionality of Google’s products to gain a
11 competitive advantage in the marketplace with respect to their competing products. Google has
12 therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY
13 and/or HIGHLY CONFIDENTIAL—SOURCE CODE under the protective order (Dkt. No. 92).
14 Although Sonos’s Administrative Motion sought to seal the entirety Exhibits 1, 4, 8, and 9, Google
15 only seeks to file under seal the portions outlined in red boxes. A less restrictive alternative than
16 sealing would not be sufficient because the information sought to be sealed is Google’s confidential
17 business information and trade secrets but has been utilized by Sonos in support of Sonos’s Motion to
18 Amend.

19 I declare under penalty of perjury under the laws of the United States of America that to the
20 best of my knowledge the foregoing is true and correct. Executed on November 30, 2022, in San
21 Francisco, California.

22 DATED: November 30, 2022

23 By: /s/ Jocelyn Ma
24 Jocelyn Ma